STATE OF UTAH
NATURAL RESOURCES & ENERGY
Oil, Gas & Mining

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
Cleon B. Feight, Division Director

4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

August 30, 1982

Mr. Harold K. Kobayashi, President
Westwater, Inc.
P.O. Box 4148
Carson City, NV  89702

                        RE:   Permitting
                              Westwater, Inc.
                              ACT/019/012
                              Grand County, Utah

Dear Mr. Kobayashi:

The Division staff has reviewed your response to the preliminary review of the Mining and Reclamation Plan (MRP) for the Harley Dome Minerals Mine. Many of the concerns were answered in your submittal, but there are still some points that have not been completely addressed.

The outstanding concerns are attached to this letter. A prompt response will be needed to ensure that the MRP is brought before the Board of Oil, Gas and Mining at their September hearings. It would be best to have your response back in our office by September 10 to avoid any further delay. Please note the letterhead for the Division's correct address.

If there are any questions concerning this review, please contact Susan Linner of my staff.

Sincerely,

JAMES W. SMITH, JR.
COORDINATOR MINED LAND DEVELOPMENT

JWS/SCL/tck

cc:  Tom Portle, DOGM
     Gerald Turner

## Rule M-3 (1)(a) - (d)

b.  Applicant still must submit a best estimate on the amount of acreage
to be disturbed on a year-by-year basis, for the purpose of knowing how
much area will be reclaimed per year and how long topsoil will be stored.

## Rule M-3 (1)(e)

a.  The recently submitted topo map shows a drainage running right through
the area to be stripped.  Please indicate how this drainage will be
rerouted during mining or, at a minimum, how erosion of topsoil and/or
humate material will be controlled.

## Rule M-3(2)(c)

Depth of available topsoil, depth to be replaced, volume of topsoil to be
stored at any one time and length of topsoil stockpiling still have not been
adequately addressed.  It is suggested that a running total of soils removed,
replaced and stockpiled be kept in a format such as that attached here as the
last page.  Please indicate if this would be acceptable.

Applicant should also make a firmer commitment to protection of stored
topsoil (i.e. seeding or some other suitable method of protection if soil will
not be used in the near future).  It was indicated that topsoil would be
seeded if stored  for more that two years, while the BLM stipulations require
seeding if the toposil is not used within one year.  This should be corrected.

## Rule M-3(2)(3)

The Division has not yet received any information relating to baseline
studies of the native vegetation in or near the permit area.  An approved
vegetation standard must be submitted before any permit approval will be given.

## Rule M-10(14)

Soils testing must be done prior to any revegetation occurring.  All tests
indicated in the Division's June 2, 1982, review letter should be performed to
determine if any soil amendments, other than humates, are needed.  At the same
time that soils testing data is submitted, the applicant should submit data on
what specific amendments (including humates) will be used, in specific
amounts.  A "test plot" appproach to revegetation (i.e. trying different soil
treatments and vegetation treatments) could be undertaken since the area will
be revegetated in small increments.  A firm commitment to the above testing
must be made prior to permit approval.

Baseline soil survey information, which was indicated to be available at
the July 12, 1982, meeting, has not yet been submitted by the applicant.

## SOIL TABULATION CHART

| Area affected (in mining sequence) | Area | 1 | 2 | 3 | etc |
|---|---|---|---|---|---|

Acreage of Area

Depth of topsoil removal (inches)

Depth of topsoil replacement (inches)*

Estimate of topsoil volume salvaged (yd$^3$)

Volume actually salvaged (yd$^3$)

Volume required for reclamation (yd$^3$)

Surplus or deficit volume (yd$^3$)

Storage status (short or long term)

Storage location

Area where soil used (if not stored)

Running total (all stockpiles)(yd$^3$)

    Short term

    Long term

* of previously stripped area recently reclaimed